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10 ANTHONY THOMAS and WENDI  
11 THOMAS and AT EMERALD, LLC

***ELECTRONICALLY FILED***  
***June 23, 2014***

9 UNITED STATES BANKRUPTCY COURT  
10 DISTRICT OF NEVADA

11 —ooOoo—

12 In Re:  
13 ANTHONY THOMAS and  
14 WENDI THOMAS,

Case No. BK-N-14-50333-BTB  
Case No. BK-N-14-50331-BTB  
Chapter 11 Cases

[Jointly Administered]

15 AT EMERALD, LLC,

16  
17 Debtors.  
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**EX PARTE MOTION FOR ORDER  
SHORTENING TIME FOR NOTICE  
AND HEARING ON MOTION TO  
SELL ASSETS FREE AND CLEAR OF  
LIENS AND MOTION TO FILE  
PURCHASE AND SALE AGREEMENT  
UNDER SEAL**

Hearing Date: OST Pending  
Hearing Time: OST Pending

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20 \_\_\_\_\_ /  
21 Debtor, AT EMERALD, LLC, a Nevada limited liability company, by and through  
22 its counsel, Alan R. Smith, Esq., of the Law Offices of Alan R. Smith, hereby moves this  
23 Court for an order shortening time for notice and hearing on the Debtor's Motion To Sell  
24 Assets Free And Clear Of Liens And Motion To File Purchase And Sale Agreement Under  
25 Seal (the "Motion") filed on June 23, 2014.

26 Pursuant to the Motion the Debtor seeks an order authorizing the sale of Debtor's  
27 asset, a 21,000 carat emerald. The Purchase And Sale Agreement requires the Debtor to seek  
28 approval of the sale on shortened time. Furthermore, although the Debtor believes that the

1 subject emerald is well protected, it is not insured. The U.S. Trustee has brought a motion  
2 to convert the case for that reason. *See* Docket No. 27. In light of these facts, the simplicity  
3 of the motion, and the fact that the sales price is sufficient to pay all creditors of both cases  
4 in full, Debtor requests the Motion be heard within seven days of its filing date as required  
5 by the Purchase And Sale Agreement.

6 Local Rule 9006 provides that the Court may shorten time in appropriate  
7 circumstances for good cause. Based upon the foregoing, Debtor believes that good cause  
8 exists for shortening time for notice and hearing of the Debtor's Motion. The Debtor's  
9 attorney (or his designated employee) has contacted the principal parties affected by the  
10 subject Motion and their agreement and comments are in the ATTORNEY INFORMATION  
11 SHEET filed separately.

12 WHEREFORE, Debtor respectfully requests that the Court shorten the time for notice  
13 of hearing on the Motion, and that the hearing on said Motion be set within seven days of the  
14 filing of the Motion or as soon as possible and as is convenient to the Court's calendar.

15 Dated this 23<sup>rd</sup> day of June, 2014.

16 LAW OFFICES OF ALAN R. SMITH

17 By: /s/ Alan R. Smith  
18 ALAN R. SMITH, ESQ.  
19 Attorney for Debtors  
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